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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: LYFT, INC. PASSENGER  
SEXUAL ASSAULT LITIGATION

MDL No. 3171  
No. 3:26-md-03171-RFL

This Document Relates to:  
ALL ACTIONS

~~PROPOSED~~ **PRETRIAL ORDER NO. 8**  
**GOVERNING PLAINTIFFS’ CO-LEAD**  
**COUNSEL AND PLAINTIFFS’ STEERING**  
**COMMITTEE**

In Pretrial Order No. 1, the Court invited plaintiffs’ counsel to apply for a lead counsel position in this MDL (Dkt. No. 2). The Court received three applications for Co-Lead Counsel (Dkt. Nos. 17, 18, 19). On March 23, 2026, the proposed Co-Lead Counsel applicants filed Plaintiffs’ Proposed Steering Committee, explaining that a Plaintiffs’ Steering Committee would also be necessary and attaching resumes for fifteen attorneys (Dkt. No. 71). In Pretrial Order No. 2, the Court appointed Roopal P. Luhana, Aimee H. Wagstaff, and Rachel Abrams as Plaintiffs’ Co-Lead Counsel. Their responsibilities, and the responsibilities and membership of the Plaintiffs’ Steering Committee, are promulgated below.

**I. COMPOSITION OF THE PLAINTIFFS’ STEERING COMMITTEE**

**Plaintiffs’ Co-Lead Counsel**

Rachel B. Abrams  
Peiffer Wolf Carr Kane Conway & Wise, LLP  
555 Montgomery Street, Suite 820  
San Francisco, CA 94111

1 Roopal P. Luhana  
2 Chaffin Luhana LLP  
3 600 Third Avenue, 12th Floor  
4 New York, NY 10016

4 Aimee Wagstaff  
5 Wagstaff Law Firm  
6 940 N. Lincoln Street  
7 Denver, CO 80203

7 **Plaintiffs' Liaison Counsel**

8 Rachel B. Abrams  
9 Peiffer Wolf Carr Kane Conway & Wise, LLP  
10 555 Montgomery Street, Suite 820  
11 San Francisco, CA 94111

11 **Plaintiffs' Federal/State Liaison Counsel**

12 Tiseme Zegeye  
13 Lieff Cabraser Heimann & Bernstein, LLP  
14 275 Battery Street, 29th Floor  
15 San Francisco, CA 94111

15 **Members**

16 Alyson S. Beridon  
17 Herzfeld, Suetholz, Gastel, Leniski and Wall, PLLC  
18 600 Vine Street, Suite 2720  
19 Cincinnati, Ohio 45202

19 Steve Cohn  
20 Chaffin Luhana LLP  
21 600 Third Avenue, 12th Floor  
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22 Tracey B. Cowan  
23 Clarkson Law Firm, P.C.  
24 633 Howard Street  
25 San Francisco, CA 94105

25 Sara Craig  
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27 555 Montgomery Street, Suite 820  
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1 Celine E. Cutter  
2 Cutter Law P.C.  
3 1901 Harrison Street, 9th Floor  
4 Oakland, CA 94612

4 Reed C. Dempsey  
5 Cooper Masterman PLLC  
6 1717 Pennsylvania Avenue, N.W., Suite 1025  
7 Washington, D.C. 20006

7 Holly Dolejsi  
8 Anapol Weiss  
9 60 South 6th Street, Suite 2800  
10 Minneapolis, MN 55402

10 Fidelma L. Fitzpatrick  
11 Motley Rice LLC  
12 40 Westminster Street, 5th Floor  
13 Providence, RI 02903

13 June P. Hoidal  
14 Zimmerman Reed LLP  
15 1100 IDS Center, 80 South 8th Street  
16 Minneapolis, MN 55402

16 Elana B. Goodman  
17 Schlesinger Law Offices, P.A.  
18 1212 Southeast Third Avenue  
19 Fort Lauderdale, FL 33316

18 Sommer D. Luther  
19 Wagstaff Law Firm  
20 940 Lincoln Street  
21 Denver, CO 80203

21 Ruth Rizkalla  
22 The Carlson Law Firm  
23 1230 Rosecrans Avenue, Suite 300  
24 Manhattan Beach, CA 90266

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26 5489 Blair Road  
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1 David L. Selby  
2 Bailey Glasser, LLP  
3 3000 Riverchase Galleria, Suite 905  
4 Birmingham, AL 35244

4 Tiseme Zegeye  
5 Lieff Cabraser Heimann & Bernstein, LLP  
6 275 Battery Street, 29th Floor  
7 San Francisco, CA 94111

7 **RESPONSIBILITIES OF APPOINTED COUNSEL**

8 In general, Co-Lead Counsel are responsible for coordinating the activities of the plaintiffs  
9 during pretrial proceedings and shall:

- 10 1. Determine (after such consultation with other members of the Plaintiffs’ Steering  
11 Committee (“PSC”) and other co-counsel as may be appropriate) the position of the  
12 plaintiffs on all matters arising during pretrial proceedings;
- 13 2. Coordinate the scheduling and conduct of discovery on behalf of the plaintiffs, as well  
14 as the preparation of protocols and schedules for discovery and the development of  
15 platforms to allow for equitable and efficient use of discovery secured through this  
16 MDL;
- 17 3. Suggest, in consultation with the Defendants, the ordering, priority, and response to  
18 pending and anticipated motions;
- 19 4. Coordinate and oversee the PSC’s responsibilities, including to schedule PSC meetings  
20 and keep minutes or transcripts of these meetings as appropriate; to appear at periodic  
21 Court-noticed status conferences and hearings and present to the Court and opposing  
22 parties the position of the plaintiffs on all matters arising during pretrial proceedings; to  
23 sign and file all pleadings that relate to all actions; and to bind the PSC in scheduling  
24 settlement discussions and discovery, setting agendas, entering into stipulations, and in  
25 other necessary interactions with any other relevant parties. Co-Lead Counsel may  
26 designate counsel in their discretion to perform these duties as appropriate and  
27 necessary to progress the litigation effectively and efficiently.

- 1 5. Delegate specific tasks to PSC Members or other counsel so as to ensure that pretrial  
2 preparation for the plaintiffs is conducted efficiently and effectively, including, at the  
3 appropriate juncture, selection of trial team(s);
- 4 6. Suggest, in consultation with Defendants, the appointment of special master(s) under  
5 Federal Rule of Civil Procedure 53;
- 6 7. Conduct settlement negotiations on behalf of the plaintiffs, but not enter binding  
7 agreements except to the extent expressly authorized;
- 8 8. Retain the services of any attorney not part of the PSC to perform any common benefit  
9 work, provided the attorney so consents and is bound by the PSC's compensation  
10 structure;
- 11 9. Maintain, in conjunction with their accountant, records of receipts and disbursements  
12 advanced by PSC members and received by the PSC and report in writing to the PSC  
13 concerning disbursements and receipts:
- 14 10. Designate counsel to schedule depositions, set agendas, and otherwise interact with  
15 defense counsel, various plaintiffs' counsel, and any other relevant parties and,
- 16 11. Perform such other duties as may be necessary for effective and efficient coordination  
17 of the plaintiffs' pretrial activities or authorized by further order of the Court.

18 Plaintiffs' Liaison Counsel shall also do or direct the following:

- 19 1. Establish and maintain a case website providing public access to relevant Court orders,  
20 forms, and joint reports, and identifying the nature of the case, date of MDL creation,  
21 presiding Judge and courthouse location, Plaintiffs' Liaison Counsel, deadlines, hearing  
22 dates, and material case developments.
- 23 2. Establish and maintain a depository for orders, pleadings, hearing transcripts, and all  
24 documents served upon plaintiffs' counsel, and make such papers available to plaintiffs'  
25 counsel upon reasonable request.
- 26 3. Perform other necessary PSC administrative and logistic functions and carry out any  
27 other duty as the Court may order.

1 Plaintiffs' Federal/State Liaison Counsel shall facilitate coordination with state court  
2 litigation.

3 All appointments made in this Order are personal to the individual attorney appointed.  
4 Accordingly, each appointee must assume personal responsibility for the performance of their duties,  
5 and no other attorneys, including members of an appointee's law firm, may substitute for the  
6 appointee in the fulfillment of their exclusive duties, except with prior approval of the Court. The  
7 Court may add or replace appointees on their request, on request of the Plaintiffs' Co-Lead Counsel,  
8 or on its own motion, as circumstances warrant.

9 It is intended and expected that—as to all matters common to the coordinated cases, and to  
10 the fullest extent consistent with the independent fiduciary obligations owed by any and all plaintiffs'  
11 counsel to their clients—pretrial proceedings shall be conducted by and through the PSC.

12 The PSC is responsible for creating its own structure, including establishing subcommittees  
13 for major litigation tasks that include ESI and discovery, law and motion/briefing, experts, trial, and  
14 a leadership development subcommittee for young lawyers in mass torts.

15 All timekeepers carrying out work for the plaintiffs' common benefit, including PSC  
16 members, who may look to any common fund or agreement for reimbursement or compensation shall  
17 maintain detailed and contemporaneous time records. The Court will issue a subsequent order  
18 regarding the guidelines and rules for work done and expense incurred for the common benefit of all  
19 plaintiffs in this MDL.

20 As previously ordered in Pretrial Order No. 2, appointments are made for a one-year period  
21 and will expire on March 25, 2027 (Dkt. No. 77). Counsel may apply for reappointment a minimum  
22 of 30 days before their term expires. Applications for reappointment must detail the nature and scope  
23 of the attorney's work on this litigation, including the time and resources that the attorney expended  
24 during the previous term.

25 **IT IS SO ORDERED.**

26 Dated: April 2, 2026



RITA F. LIN  
United States District Judge

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